

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

Titus Henderson,

Plaintiff,

W.D. Wis. #

21-cv-346-jdp

V.

U.S. Atty. General, Gary Hamblin, Tim Haines,
Jon Litscher, Ed. Wall, Matthew Frank,
Rick Rosinski, Peter Hildebrand, Richard Schaeffer,
Beth Gert, Gary Boughton, Ellen Roy, Lt. Gurnham,
Lance, Col. Hulse, Lt. Hoofield, Trish Lansing, U.S. Hable,
Lt. Tom, J. Sickinger, Sgt. Laxton, Capt. Brown, Capt. Hoepper,
Capt. Gardner, M. Henneman, Brian Wood, Sgt. Jones, Tim Taylor,
Lt. Primmer, Col. Cockroft, Col. Finner, Maj. Taylor,

Defendants.

CIVIL ACTION

42 U.S.C. § 1983

PARTIES

PLAINTIFF: Titus Henderson

GBCT, PO Box 19222

2833 Kinnicklee Ln, Green Bay, WI 54301

DEFENDANT: U.S. Attorney General

950 Pennsylvania Ave, Washington, DC 20530

1

Edward Wall, Jon Litscher, Gary Hamilton, Rich Frenkel, Kevin Carr, Matthew Frade,
3099 E. Washington Ave., Madison, WI 53719

Richard Schneider, Peter Suber, Tim Hones, Ellen Ray, Gary Jennings, Tash Lonsom, U.M. Hobbie, Brian Koval, Lt. Gerald Walker, Lt. U. Tom, Lt. Rojce, David Gurdner, Lt. Brian, Sgt. Heppes, Sgt. Miller, Sgt. Veckert, Tim Jones, Scott Jones, Sgt. Farnel, Mary Taylor, Lt. Trimmer, Sgt. Jones, Sgt. Lester, Michael Henderson, Sgt. Seibert,
WSPF, 1101 Morrison Dr., Roseland, WI 53085

"All Defendants are sued in their Official and Individual Capacity."

JURISDICTION / VENUE

U.S. District Court, Western District Wisconsin has personal and subject matter jurisdiction over this action as proper venue, purs. 28 U.S.C. § 1331, § 1332, and § 1334; because civil rights violation occurred in Western District Wisconsin.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

Plaintiff Henderson has exhausted all available administrative remedies purs. 42 U.S.C. § 1983 and 32 C.F.R. before filing this action.

I, JAMES H. HARRIS, do hereby certify that the following is a true and correct copy of the original document as it appears in the original document.

I, JAMES H. HARRIS, do hereby certify that the following is a true and correct copy of the original document as it appears in the original document.

I, JAMES H. HARRIS, do hereby certify that the following is a true and correct copy of the original document as it appears in the original document.

I, JAMES H. HARRIS, do hereby certify that the following is a true and correct copy of the original document as it appears in the original document.

I, JAMES H. HARRIS, do hereby certify that the following is a true and correct copy of the original document as it appears in the original document.

I, JAMES H. HARRIS, do hereby certify that the following is a true and correct copy of the original document as it appears in the original document.

QPRs, the FBI document Submit was 110
hours of detention against prison officials
in violation of the Constitution.

The WFO 2017 document Track 100 200 hours
of detention, but only 100 hours of detention
was used. The WFO 2017 document was 110
hours of detention against prison officials
in violation of the Constitution.

The WFO 2017 document Track 100 200 hours
of detention, but only 100 hours of detention
was used. The WFO 2017 document was 110
hours of detention against prison officials
in violation of the Constitution.

The WFO 2017 document Track 100 200 hours
of detention, but only 100 hours of detention
was used. The WFO 2017 document was 110
hours of detention against prison officials
in violation of the Constitution.

The Attorney General is now challenging
Constitutionally of 42 U.S.C. 1983 being used to
impose discipline on prisoners in violation of
the Constitution and Administrative Code.

Adult Conduct Report #1411564

- 11) June 30, 2003, I received fabricated C.R. from COTL Sharon and Sgt. Bausch in retaliation for grievance in ICRS that Henderson violated 303.24: Disobeying Orders, 303.34: Theft, 303.47: Possession of Contraband- Miscellaneous, 303.63: Violation of Policy & Procedures, in addition to punishment of loss privileges purs. to 303.72(2-4) by false Behavior Log Report.
- 12) Lt. Grandin "Reviewing Staff" denied Henderson requested staff witnesses and report writer at hearing, July 3, 2003.
- 13) Henderson was denied access to attached documents to C.R. as evidence.
- 14) Lt. Grandin "Disciplinary Officer & Reviewing Staff" used false Behavior Log Reports to impose 360 Days Prog. Seg., as a partial fact-finder, on July 14, 2003, & destroyed personal books violating 1st Amend..
- 15) July 19, 2003, I appealed C.R. due process errors to Warden Huibregtse.
- 16) Sept. 4, 2003, Warden Huibregtse returned C.R. for correction of record.
- 17) Lt. Grandin corrected C.R. decision Oct. 31, 2003; I appealed to Warden Huibregtse a second time Nov. 2, 2003 of due process violations.
- 18) Nov. 18, 2003, Warden Huibregtse affirmed C.R. disposition of 360 Prog..
- 19) On _____, I filed ICRS challenging due process violation.
- 20) On _____, ICE dismissed due process complaint.
- 21) On _____, I appealed ICE dismissal to CCE+OOS in Mediscar.
- 22) On _____, CCE+OOS affirmed disposition and dismissed due process complaint WSPF-2003-

Adult Conduct Report #1877491

- 73) May 1, 2007, I received fabricated C.R. by Capt. L. Brown, Henderson violated 303.271: Lying About Staff, 303.16: Threats as retaliation for filing ICRS grievance WSPF-2007-4625 + exoneration on C.R. #1675449.
- 24) May 14, 2007, Lt. Boisen "Reviewing Staff" refused to allow Adv. Sgt. Henke to collect and present documentary evidence against charges.
- 25) I was not given "DOC-68: Notice of 21-Day Time Limit Ext.", and C.R. was held past 52 days, making witnesses unavailable.
- 26) June 20, 2007, Lt. Boisen "Disciplinary Officer + Reviewing Staff" used fabricated report to support finding of guilt/disposition, + imposed 180 Days Disc. Sep. / w/ 30 Days Rm. Conf. / w/ Loss of Electronics, as retaliation for writing WSPF-2007-4625 of staff misconduct.
- 27) June 27, 2007, I appealed due process violation to Warden Huibregtse.
- 28) Aug. 21, 2007, Deputy Warden Huibregtse affirmed disposition.
- 29) Aug. 25, 2007, I filed ICRS challenging due process violations.
- 30) Sept. 13, 2007, ICE + P. Huibregtse dismissed due process complaint.
- 31) Sept. 15, 2007, I filed appeal of ICE dismissal to CCE + OOS.
- 32) Sept. 28, 2007, CCE + OOS dismissed due process complaint and affirmed C.R. disposition WSPF-2007-25752 / WSPF-2007-4625.

Adult Conduct Report # 1931009

- 33) On May 4, 2007, CO Hulse lied that Henderson committed violation of 303.16 + 303.27, Threats + Lying; in addition to demotion + taking of privileges by Behavior Log Report violating 303.66-.68.
- 34) I received C.R. on May 4, 2007, excluding Behavior Log + evidence.
- 35) Lt. Boisen denied all documentary evidence as prime investigator - Reviewing Officer before hearing, preventing a defense.
- 36) Lt. Boisen as Reviewing Staff of evidence before hearing with witness staff CO Hulse, and as Disciplinary Staff, violate 303.76(5) + 303.82(2).
- 37) Lt. Boisen refused to provide Henderson copy of alleged letter, and allegedly destroyed letter as contraband prohibited by 303.85-.86
- 38) Lt. Boisen as Disciplinary (Sole) Staff + Reviewing Staff, imposed disposition of 30 days room confinement / w/ loss of electronics, on June 4, 2007.
- 39) As double punishment, Henderson Behavior Log punishment was done for same offense before disciplinary decision, violating 303.66-.68.
- 40) Confiscation of alleged letter violate 1st Amend. free speech.
- 41) I was not given notice of "21 day time limit extension", and Ellen Ray forged 21 Day Ext. purs. to 303.76(3). DOC-68 form.
- 42) On June 12, 2007, I appealed decision to Warden Hurlburt.
- 43) On July 2, 2007, Warden approved discipline; "21 Day Notice not required".
- 44) On July 5, 2007, I filed Inmate Complaint of due process violation.
- 45) On July 20, 2007, ICE + Warden dismissed complaint.
- 46) On July 24, 2007, I appealed ICE + Warden decision to Madison Carr. Complaint Exam. (CCE).
- 47) On August 1, 2007, CCE + OOS dismissed appeal of due process violation. WSPF-2007-19843

Free Speech

Adult Conduct Report #1931010

- 48) On May 11, 2007, CP. Hulce lied to promote his homosexual tendencies upon African-Americans as racial animus that Henderson committed 303.15: Sexual Conduct, 303.24: Disobeying Orders, 303.25: Disrespect, + 303.28: Disruptive Conduct; in addition to Behavior Log false report.
- 49) I was ~~never~~ issued C.R. and C.R. issuance was forged on May 14, 2007 as DOC-9 show continued tracing of copy date.
- 50) Lt. Boisen denied all witnesses + documentary evidence as "Reviewing Staff" and "Disciplinary Staff" June 1, 2007
- 51) Sec. Dir. Boughton did not give "Notice of 21-Day Ext. of C.R." to present defense.
- 52) "Notice of 21-day Ext." DOC-68 form was forged by Ellen Ray in files.
- 53) Lt. Boisen as Disciplinary Staff + Reviewing Staff, imposed 180 days disciplinary separation prohibited by 303.76(5), 303.82(2), June 4, 2007.
- 54) Lt. Boisen used false Behavior Log as finding of guilt, violating 303.66-.68.
- 55) On June 12, 2007, I appealed discipline to Warden Huibregtse.
- 56) On July 2, 2007, Warden Huibregtse affirmed discipline.
- 57) On July 3, 2007, I filed Inmate Complaint challenging due process.
- 58) On July 20, 2007, ICE + Huibregtse dismissed ZCRS appeal of C.R.
- 59) On July 24, 2007, I appealed Warden decision to Carr. Complaint Exam. in Madison of due process violations.
- 60) On September 6, 2007, CLE + OOS dismissed appeal of C.R. violations
WSPP-2007-19842

Adult Conduct Report #1931125

- 61) On May 18, 2007, I received C.R. that CD Hulce + Lt. Hanfeld lied I violated 303.24: Disobeying Orders, 303.28: Disruptive Conduct; 303.35: Damage / Alteration of Property, 303.40: Unauthorized Transfer of Property; in addition to Behavior Log Report punishment violating 303.66-68.
- 62) Lt. Boisen as Reviewing Staff + Disciplinary Staff denied Henderson's requested witnesses + videotape by Advoc. Sgt. Hanke, May 29, 2007.
- 63) Lt. Boisen sole disciplinary officer + Reviewing Staff imposed 210 days disciplinary separation. Lt. Hanfeld + CD Hulce had already punished Henderson for the same offense by Behavior Log Report of 10 Days loss of clothes, bedding + sheets, + control status by racism + sexual degradation.
- 64) Lt. Boisen use of false Behavior Log and invisible videotape without disclosing content to Henderson, as evidence, does not support guilt.
- 65) I was not given access to any evidence nor did any evidence exist to support disposition + guilt, as the only evidence mention is ("Page 1").
- 66) On Sept. 10, 2007, I appealed due process violation to Warden Hübregtse.
- 67) On July 25, 2007, Warden Hübregtse affirmed due process violations as "Disposition consistent with progressive discipline", based on racism.
- 68) On Sept. 14, 2007, T. Lansing denied appeal from CCE recommendation.
- 69) On Aug. 1, 2007, I filed ICRS challenging due process violation.
- 70) On Aug. 15, 2007, ICE + Warden Hübregtse dismissed WSPF-2007-22862 without investigation of racist discipline.
- 71) On Aug. 19, 2007, I appealed dismissal to CCE + OOS in Madison.
- 72) On Sept. 7, 2007, CCE + OOS dismissed Inmate Complaint WSPF-2007-22862, WSPF-2007-28069, WSPF-2007-29590.
- 73) Correction of record dates + evidence was forged with C.R. 1931152.

Adult Conduct Report #1931091

74) On June 6, 2007, Sgt. Sickinger lied and has a history of racial animus toward African-Americans that Henderson violated 303.24: Disobeying Orders, 303.25: Disrespect, 303.28: Disruptive Conduct, and 303.63: Violation of Policies & Procedures; in addition to false Behavior Log Reports violating 303.66-68.

75) On June 7, 2007, I was issued C.R. by Corr. Staff

76) I was not given "Notice of 21-Day Time Ext." DOC-68 Form to present defense, violating 303.76(3)

77) Lt. Boisen refused to allow Henderson to call witnesses & present documentary evidence against disciplinary charges as Reviewing Staff.

78) Lt. Boisen used false Behavior Log entry & punishment as finding of guilt.

79) Lt. Boisen being Disciplinary Staff & Reviewing (Investigator) Staff, imposed 30 days room conf. / w/loss of electronics violating 303.76(5) & 303.82(2),

On July 11, 2007; and refused to give copy of evidence.

80) On July 22, 2007, I appealed C.R. to Warden P. Huibregtse.

81) Aug. 22, 2007, Warden Huibregtse affirmed C.R. disposition.

82) On , I filed Inmate Complaint of due process violations.

83) On , ICE & Huibregtse dismissed appeal of complaint.

84) On , I appeal Warden dismissal of ZCRS to CCE

Corr. Complaint Exam. in Madison.

85) On , CCE & BOS dismissed appeal of ZCRS of

C.R..

Adult Conduct Report #1676149

- Free Speech
- 86) On March 10, 2008, I received C.R. by R. Hable lying that I violated 303.24: Disobeying Orders, 303.25: Disrespect, in addition to false Behavior Log Report imposition of punishment for the same infractions by loss of electronics 30 days + demotion purs. to 303.72 before hearing.
 - 87) Lt. Tom "Reviewing Staff" denied Henderson all requested witnesses and documentary evidence of Behavior Log + Interview Request (DOC-761).
 - 88) Lt. Tom as sole "Disciplinary Staff + Reviewing Staff" used false Behavior Log Report, retaliated for filing pending criminal investigation against, by imposing 90 Days Disciplinary Sep. + 30 Days Res. Conf. for their failed attempts to kill me, on 3-27-2008.
 - 89) There was no evidence to support finding of guilt nor imposition of punishment twice for alleged same offense violating 1st Amend. Freedom of Speech based on context-discrimination.
 - 90) On April 3, 2008, I appealed disposition to Warden Huibregtse.
 - 91) On April 24, 2008, Deputy Warden Boughton "Revised C.R. for Correction" to delete "Behavior Log" of false allegations but affirmed to hide illegal documentation, violation of 303.76(6-9).
 - 92) On May 5, 2008, I filed ZCRS challenging due process violation.
 - 93) On May 15, 2008, Deputy Warden Boughton + ICE dismissed C.R. complaint.
 - 94) On May 20, 2008, I appealed ICE decision to CCE + OOS.
 - 95) On June 2, 2008, CCE + OOS dismissed complaint challenging due process violations. WSPF-2008-12690
- 11

Adult Conduct Report #1965482

- 96) On March 20, 2008, I received C.R. by Sgt. Laxton lied with racial animus (Known Racist against African-Americans) that I violated 303.24: Disobeying Orders, 303.25: Disrespect, 303.28: Disruptive Conduct, 303.16: Threats; in addition I was already being punish for same offense by Behavior Log Report of false allegations before due process hearing pws. to 303.72(1)(2)(b-d), + denotation.
- 97) C.R. is incomplete as violating 303.
- 98) Lt. Tom as "Reviewing Staff + Disciplinary Staff" denied all Henderson's requested witnesses + videotape + documentary evidence to present defense against charges, violating 303.76(5) + 303.82(2).
- 99) Lt. Tom being "Disciplinary Officer + Reviewing Staff" imposed 120 days Disciplinary Sep. violating 303.76(5) + 303.82(2), + physical degradation on Back-of-Cell Restriction as punishment before hearing.
- 100) No evidence existed to support finding of guilt/disposition April 3, 2008.
- 101) On April 7, 2008, I filed appeal of C.R. decision to Warden Huijbregtse.
- 102) In violation of 303.76(5-9), Deputy Warden Boughton affirmed C.R. decision on June 10, 2008 past the 60 day time limit.
- 103) June 16, 2008, I filed ICRS challenging due process violation.
- 104) June 17, 2008, Deputy Warden Boughton dismissed due process challenge.
- 105) June 25, 2008, I appealed ICE + Boughton decision to CLE + OOS.
- 106) On June 30, 2008, CLE + OOS ordered Lt. Tom + Boughton to correct due process violations, but dismissed appeal complaint.
- 107) Lt. Tom + Boughton refused to correct due process violations.
- 108) Lt. Tom was under present criminal investigation in John Doe #07-JD-10 making him partial fact-finder. WSPF-2008-16535.

Adult Conduct Report #1965307

- 109) March 31, 2008, I received false C.R. as retaliation by Capt. L. Brown that Henderson violated 303.271: Lying About Staff, because Henderson filed a ZCRS grievance for staff misconduct + C.R. 1931184.
- 110) Capt. Hoepper "Reviewing Staff" on April 3, 2008, denied Henderson all requested videotapes, documentary evidence, + witnesses preventing presentation of defense
- 111) April 17, 2008, Lt. Hanfeld (a known racist), used false Behavior Log Report as finding to support guilt/disposition, imposing 360 Days Disc. Sep. + 30 Days Rm. Conf. as retaliation for filing inmate grievance.
- 112) April 22, 2008, I filed appeal of due process violation to Warden.
- 113) June 23, 2008, in violation of 60 Day time limit, Deputy Warden Boughton affirmed disposition for retaliation of WSPF-2008-37959
- 114) June 28, 2008, I filed ZCRS challenging due process violation.
- 115) July 2, 2008, ICE + Boughton dismissed due process complaint.
- 116) July 6, 2008, I appealed ICE dismissal to CCE + DOS in Madison.
- 117) July 10, 2008, CCE + DOS dismissed due process complaint and affirmed C.R. disposition in WSPF-2008-18033, WSPF-2008-11445.



Adult Conduct Report # 1965344

- 118) As retaliation for filing criminal investigation #07-JD-10, Peter Huibregtse authorized Capt. D. Gardner to write false charges of rule infraction 303.27: Lying + 303.271: Lying About Staff which I received June 2, 2008, in addition to false Behavior Log.
- 119) June 4, 2008, Lt. Tom denied Henderson all requested witnesses and documentary evidence to present defense against charges.
- 120) Lt. Tom being "Reviewing Staff + Disciplinary Staff" violating 303.76(5) and 303.82(2), imposed 30 Days Loss of Recreation as punishment, on July 11, 2008, as partial fact-finder, by Behavior Log false report.
- 121) Lt. Tom interviewed COTW Weigel after due process hearing and destroyed evidence allegedly.
- 122) No evidence existed to support finding of guilt nor disposition because Lt. Tom disposed of evidence, C.R. past 21 days.
- 123) I never received extension of 21 day time limit DOC-68 form.
- 124) On July 13, 2008, I appealed C.R. decision to Warden P. Huibregtse.
- 125) In violation of 303.76(5-9), Deputy Warden Boughton affirmed decision, on July 23, 2008 as retaliation for John Doe #07-JD-10.
- 126) July 25, 2008, I filed ICRS challenging due process violations.
- 127) July 30, 2008, ICE + Boughton dismissed due process complaint.
- 128) Aug 2, 2008, I filed appeal of dismissal to CCE + DOS in Madison.
- 129) August 22, 2008, CCE + DOS approved disposition and dismissed appeal. WSPF-2008-20360



Adult Conduct Report # 1965360

- 130) Dec. 18, 2008, I was served with fabricated C.R. by Capt. Brown that Henderson violated 303.271: Lying About Staff as retaliation for filing ICRS grievance + exonerating myself on the same previous charges in C.R. # 1965273.
- 131) Aug. 26, 2008, Lt. Hanfeld "Reviewing Staff" denied all Henderson's requested witnesses, + documentary evidence to prevent defense against charges.
- 132) Ellen Ray + Lt. Tom forged + distorted Henderson's defense on DOC-84 at hearing which Henderson never received notice of C.R., on Sept. 8, 2008; imposed 180 Days Disc. Sep. / 30 Days Rm. Conf. as retaliation for writing ICRS grievances WSPF-2008-19341. as partial fact-finder - ^{Past 21} day time
- 133) Sept. 8, 2008, I filed appeal to Warden Huibregtse of due process violation.
- 134) Sept. 16, 2008, Deputy Warden Boughton dismissed appeal affirming C.R.
- 135) Sept. 19, 2008, I filed ICRS of due process violation in C.R.
- 136) Oct. 3, 2008, Deputy Warden Boughton dismissed due process complaint.
- 137) Oct. 5, 2008, I appealed ICE dismissal to CCE + OOS in Madison.
- 138) Oct. 15, 2008, CCE + OOS dismissed due process complaint and affirmed C.R. disposition. WSPF-2008-25570/2008-19341.



Adult Conduct Report # 2019993

- 137) August 31, 2009, I received fabricated C.R. by Sgt. Hennerman + B. Koel as retaliation for filing grievance against Sgt. Jones, that Henderson violated 303.24: Disobeying Orders, 303.63: Violation of Policy and Procedures; in addition to 15 loss of meal trays by Behavior Log Report.
- 138) Brian Koel as investigator + disciplinary officer used false Behavior Log Report to impose 5 days Loss of Electronics in addition to double punishment by Behavior Log Report of 15 days loss of food tray, as a partial fact-finder because he's a defendant in lawsuit #09-C-170-bbc.
- 139) I appealed disposition on Sept. 25, 2009 to Warden Thibregtse.
- 140) Oct. 20, 2009, Deputy Warden Boughton returned C.R. to add evidence.
- 141) Oct. 28, 2009, B. Koel forged evidence + disregard evidence that the videotape show never existed.
- 142) Oct. 29, 2009, I filed appeal to Warden challenging evidence + procedures.
- 143) Nov. 25, 2009, Trish Lansing "VOIDED" appeal process of violations.
- 144) Nov. 29, 2009, I filed ICBS of "VOIDED" appeal of C.R.
- 145) Dec. 7, 2009, E. Ray (ICE) denied due process complaint.
- 146) Dec. 8, 2009, I appealed dismissal to Warden Thibregtse.
- 147) Dec. 10, 2009, Deputy Warden Boughton affirmed dismissal of due process complaint WSPF-2009-26658.

Adult Conduct Report #2019925

- 150) Sept. 3, 2009, I received false C.R. by Sgt. M. Henneman; Henderson violated 303.25: Disrespect as retaliation for staff misconduct ICRS, in addition to Behavior Log Report.
- 151) Brian Kool as "Investigator of Behavior Log Report / Disciplinary officer" used false Behavior Log as double punishment to support finding of guilt/disposition without evidence, imposing 12 Days Rm. Conf. added to punishment of Loss privileges by demotion, as a partial fact-finder on Sept. 24, 2009, because he's a defendant in lawsuit #09-C-170-bbc.
- 152) Sept. 27, 2009, I filed due process violation appeal to Warden.
- 153) Oct. 20, 2009, Deputy Warden Boughton "Remanded" decision to correct C.R.
- 154) Nov. 11, 2009 after correction by "Remand", I filed Second appeal to Warden of due process violations.
- 155) Nov. 12, 2009, Trish Lansing "VOIDED" appeal process.
- 156) Nov. 12, 2009, I filed appeal ICRS challenging due process violation.
- 157) Nov. 18, 2009, ICE + Boughton dismissed due process complaint.
- 158) Nov. 23, 2009, I received ICE + Boughton dismissal in Inst. mail.
- 159) Nov. 24, 2009, I filed appeal of ICE dismissal to CCE + DOS.
- 160) Feb. 22, 2010, CCE + DOS dismissed due process complaint and affirmed C.R. disposition in WSPF-2009-25195

Free Speech

Adult Conduct Report # 2107712

- 100) On Sept. 8, 2009, I received fabricated C.R. by COT Scott Jones that Henderson violated 303.25: Disrespect as retaliation for filing ZCRS contributing to COT S. Jones demotion July 11, 2009, in addition to False Behavior Log Reports violating 303.66-.68.
- 101) I was not given notice of Time /Date/Place of hearing, + Sec. Dir. Horner told B. Kool to discredit Henderson statement before hearing.
- 102) Brian Kool stated, "You're already guilty, so we're going through the formality". Brian Kool refused to accept written statement + refused to interview witnesses + videotape evidence requested by Henderson.
- 103) Oct. 2, 2009, Brian Kool as sole "Disciplinary Staff + Reviewing Staff", + as a defendant in lawsuit #09-C-170-lbc; imposed 7 days loss of electronics without evidence to support finding of guilt/disposition.
- 104) Disposition was based on false Behavior Log Report as guilt.
- 105) Oct. 4, 2009, Z appealed due process violations to Warden Huibregtse.
- 106) Oct. 29, 2009, in violation of 303.76(5-9); Deputy Warden Boughton affirmed due process violations of disposition.
- 107) Nov. 4, 2009, ICE received appeal complaint due process violation.
- 108) Nov. 5, 2009, ICE + Boughton dismissed due process complaint.
- 109) Nov. 13, 2009, CCE + ODS received C.R. appeal of due process.
- 110) March 5, 2010, CCE + ODS dismissed due process, affirming C.R. disposition. WSPF-2009-24466 citing WSPF-2009-24465.

Adult Conduct Report # 2107719

- 172) Sept. 29, 2009, I received fabricated C.R. by COX S. Jones that Henderson violated 303.15: Sexual Conduct, 303.24: Disobeying Orders, 303.25: Disrespect, in addition to punishment by Behavior Log Report of false charges to retaliate for writing ICRS + denying food.
- 173) Lt. Tom "Reviewing Staff/Investigator" denied Henderson all his requested witnesses, videotapes, + documentary evidence on Oct. 6, 2009 to prevent Henderson from presenting a defense.
- 174) Oct. 6, 2009, as "Reviewing Investigator", Lt. Tom wrote his own personal witness statement/w videotape against Henderson and labeled his statement/w videotape as "Confidential" pursuant to 303.81(5) as evidence.
- 175) Henderson filed an "Open Records Request" for evidence denied by Warden.
- 176) Henderson did not receive a "DOC-68: Notice of 21-Day Ext. of C.R..
- 177) Lt. Primer denied Henderson videotape at hearing and refused to allow Henderson to make defense statement in the charges, Oct. 26, 2009.
- 178) Lt. Primer used false Behavior Log Report + Lt. Tom false confidential statement to impose Disposition of 180 days Disciplinary Sep. on Oct. 26, 2009 as finding of guilt to support disposition, 15 days loss of food.
- 179) On Oct. 29, 2009, I filed appeal to Warden Huijbregt challenging due process.
- 180) Nov. 17, 2009, in violation of 303.76(5-10), Deputy Warden Boughton affirmed C.R. disposition.
- 181) 11-20-09, I filed ICRS challenging due process violations.
- 182) ICE + Boughton dismissed due process complaint.
- 183) I appealed ICE dismissal to CCE + OOS.
- 184) CCE + OOS dismissed due process complaint and affirmed C.R. disposition.

Adult Conduct Report #2019182

185) Oct. 9, 2009, I received racist fabricated C.R. from COTB.

McCullick that Henderson violated 303.24: Disobeying Orders, 303.28: Disruptive Conduct, 303.63: Violation of Inst. Policies + Procedures; in addition to false Behavior Log Reports to be punished by control status, deprivation of linen, etc. for following Doctor's Orders.

186) Lt. Primmer "Reviewing Staff" denied all Henderson's requested witnesses, videotapes, + documentary evidence on Oct. 24, 2009 because Lt. Primmer stated "I don't want to support your lawsuit you're filing".

187) Oct. 24, 2009, Lt. Primmer selected his video + wrote his personal Witness Statement against Henderson as "confidential informant. 303.81(3).

188) I did not receive DOC-68 "Notice of 21-Day Time Limit", 303.76(3).

189) Nov. 14, 2009, Lt. Primmer used false Behavior Log Report to impose 30 Days Rm. Conf. and \$7.50 Medical copay as following Doctor's orders, and no evidence existed to support finding of guilt nor disposition.

190) Nov. 16, 2009, I filed appeal of due process violation to Warden Huijbregtse.

191) Dec. 30, 2009, in violation of 303.76(5-10), Deputy Warden Boughton affirmed disposition and due process violation.

192) Jan. 10, 2010, I filed ICRS challenging due process violations.

193) Jan. 13, 2010, ICE + Boughton dismissed due process complaint.

194) Jan. 17, 2010, I filed appeal to CCE + OOS of ICE dismissal, Tracey Gerber, COTB, McCullick, + COX Cockcroft held appeal until Feb. 9, 2010.

195) June 4, 2010, CCE + OOS affirmed disposition and dismissed due process complaint. WSPF-2010-772. cf. WSPF-2010-771, WSPF-2010-1913, WSPF-2010-1432 same decision by OOS.

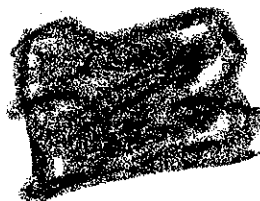
 20

Adult Conduct Report #2136151

- 196) On Oct. 13, 2009, I received fabricated C.R. by COIL Tim Jones as retaliation for filing inmate grievances contributing to his brother's demotion. July 11, 2009, that Henderson violated 303.24: Disobeying Orders, 303.63: Violation of Policy & Procedures, 303.28: Disruptive Conduct, in addition to punishment and cell extraction by false Behavior Log Reports.
- 197) Lt. Primmer "Reviewing Staff" denied all Henderson's requested videotapes, witnesses, and documentary evidence Oct 24, 2009 preventing Henderson from presenting defense, & fail to give notice of time/date/place of hearing.
- 198) Oct. 24, 2009, Lt. Primmer gave his personal witness statement to support COIL Jones C.R. with videotape as "confidential informant" pursuant to 303.81(5).
- 199) I did not receive "DOC-68: Notice of 21-Day Time Limit" 303.76(3).
- 200) Nov. 14, 2009, Lt. Primmer as sole "Disciplinary Officer & Reviewing Staff" used his "confidential witness" statement & false Behavior Log Report to support finding of guilt & impose 30 Days Rm. Conf., as a partial fact-finder, and \$7.50.
- 201) Nov. 16, 2009, I filed appeal of due process violation to Warden Huibregtse.
- 202) Dec. 30, 2009, in violation of 303.76(5-10), Deputy Warden Boughton affirmed C.R. disposition for following Doctors orders.
- 203) Jan. 10, 2010, I filed ICRS challenging due process violations.
- 204) Jan. 13, 2010, ICE & Boughton dismissed due process violations.
- 205) Jan. 17, 2010, I filed appeal of ICE to CCE & OOS of dismissal.
- 206) June 4, 2010, CCE & OOS dismissed due process violation and affirmed disposition in WSPF-2010-771 & WSPF-2009-23377.

Adult Conduct Report #2136111

- 207) Oct. 16, 2009, I received fabricated C.R. by COIT Cockcroft that Henderson violated 303.24: Disobeying Orders, 303.28: Disruptive Conduct, 303.36: Misuse of State or Federal Property, 303.63: Violation of Inst. Policy & Procedures; in addition to punishment by Behavior Log Report of taking bedding, medical wedge, & clothes.
- 208) Lt. Primmer "Reviewing Staff/Investigator" denied all Henderson's requested witnesses, videotapes, & documentary evidence to prevent defense of charges; I was not given DOC-68, Notice of 21-Day Time Ext. for hearing
- 209) Oct. 23, 2009, Lt. Primmer filed his personal witness statement w/ selected videotape as "confidential witness" purs. to 303.81(5).
- 210) Nov. 14, 2009, Lt. Primmer "Disciplinary Staff & Reviewing Investigator" used false Behavior Log Report to impose 60 Days Disciplinary Sep. as a second punishment for same offense, without evidence to support guilt nor was there evidence to impose disposition
- 211) Nov. 17, 2009, I filed appeal to Warden Hubregtse of due process.
- 212) Dec. 15, 2009, in violation of 303.76(5-10); Deputy Warden Boughton affirmed disposition and due process violations.
- 213) Dec. 16, 2009, I filed ICRS challenging due process violations.
- 214) Dec. 28, 2009, ICE & Boughton dismissed due process complaint.
- 215) Jan. 5, 2010, I filed appeal to CCE & OOS in Madison.
- 216) March 10, 2010, CCE & OOS affirmed C.R. disposition and dismissed complaint WSPF-2009-27926.



Adult Conduct Report # 2136190

- 217) Jan. 6, 2010, I received fabricated C.R. as retaliation for making grievance about staff misconduct by CO Watters that Henderson violated 303.24: Disobeying Orders, 303.25: Disrespect, 303.28: Disruptive Conduct, in addition to demotion by false Behavior Log Report.
- 218) Jan. 10, 2010, Lt. Tom, sole "Reviewing Staff" created & denied all Henderson's requested witnesses, videotapes, & documentary evidence preventing Henderson from establishing a defense.
- 219) Jan. 10, 2010, Lt. Tom created & submitted his own personal witness statement against Henderson as a confidential informant / w/ videotape purs. to 303.81(5), Lt. Tom is a defendant in lawsuit #09-C-170-bbc/10-cv-109.
- 220) Jan. 14, 2010, Lt. Tom, sole "Disciplinary Officer" used false Behavior Log and his personal witness statement to support finding of guilt, imposing punishment of 60 Days Loss of Recreation, in addition to demotion punishment by Behavior Log for same offense, as a partial fact-finder.
- 221) Jan. 18, 2010, I filed appeal of due process violations to the Warden.
- 222) February 1, 2010, Deputy Warden Boughter affirmed disposition of C.R..
- 223) Feb. 6, 2010, I filed ICPS challenging due process violation.
- 224) Feb. 19, 2010, ICE & Boughter dismissed due process complaint.
- 225) Feb. 21, 2010, I appealed ICE dismissal to CCE & OOS.
- 226) April 30, 2010, CCE & OOS dismissed due process complaint & affirmed disposition in WSPF-2010-3028



Adult Conduct Report # 2107792

- 227) Feb. 2, 2010, I received fabricated C.R. by Nurse Darren Foster as retaliation for/to expose confidential medical communication to unqualified prison staff, that Henderson violated 303.25: Disrespect, 303.28: Disruptive Conduct about exposure of medical files.
- 228) Feb. 6, 2010, Lt. Primmer "Reviewing Staff" denied all Henderson's requested witnesses, videotapes, & documentary evidence directly undercutting allegations in C.R., preventing establishment of a defense.
- 229) Feb. 19, 2010, Lt. Tam "Disciplinary Officer" used his investigation of Nurse Jo Waterman to support finding of guilt & imposed 30 Days Rm. Conf. as punishment as a partial fact-finder, because Lt. Tam is a defendant in lawsuit #09-C-170-WC/10-CV-109, & investigator of release of medical files.
- 230) Feb. 22, 2010, I filed appeal of due process violations to Warden.
- 231) March 15, 2010, Deputy Warden Boughton affirmed C.R. disposition.
- 232) March 18, 2010, I filed ICHS challenging due process violation in C.R..
- 233) April 6, 2010, ICE & Boughton dismissed due process complaint.
- 234) April 13, 2010, I filed appeal of ICE dismissal to CCE & OOS.
- 235) June 10, 2010, CCE & OOS dismissed due process complaint and affirmed disposition in WSPF-2010-6141

24

Adult Conduct Report # 2136412

- 236) Feb. 5, 2010, I received fabricated C.R. as retaliation for freedom of Speech by Capt. L. Brown, that Henderson violated 303.271: Lying About Staff, 303.48: Unauthorized Use of Mail, assisted by COX Huke.
- 237) Feb. 10, 2010, Lt. Tom "Reviewing Staff" denied all Hendersons requests for witnesses, videotapes, & documentary evidence directly under-cutting allegations in C.R., preventing establishment of defense.
- 238) Feb. 19, 2010, Lt. Tom, sole "Disciplinary Officer & Reviewing Staff" used false C.R. as to support finding of guilt & imposed 240 Days Disc. Sep. / 16 Days Rm. Conf., as partial fact-finder; he's a defendant in lawsuit #09-cv-170-bbc.
- 239) Feb. 22, 2010, I filed due process violation appeal to Warden Huibregtse.
- 240) March 15, 2010, Deputy Warden Boughton affirmed C.R. disposition.
- 241) March 18, 2010, I filed ICRS challenging due process violations in C.R..
- 242) April 6, 2010, ICE & Boughton dismissed due process appeal complaint.
- 243) April 13, 2010, I filed appeal of ICE dismissal to CCE & OOS.
- 244) June 10, 2010, CCE & OOS dismissed due process complaint and affirmed C.R. disposition in WSPF-2010-6142

25

Adult Conduct Report #2019797

- 245) March 31, 2010, I received fabricated C.R. by COI C. Finnell that Henderson violated 303.16: Threats, 303.25: Disrespect, 303.48: Unauthorized Use Of Mail, in addition to corporal punishment by Behavior Log Report of being denied food + physical degradation.
- 246) As previous punishment for the same offense, Lt. Brown, Capt. D. Gardner authorized denial of mail, physical degradation, et al. March 31, 2010.
- 247) April 2, 2010, Lt. Tom "Reviewing Staff" denied all Henderson's requested witnesses, + documentary evidence undercutting allegations in C.R., preventing Henderson from presenting a defense.
- 248) April 7, 2010, Lt. Tom "Disciplinary Officer" used false Behavior log because the alleged letter was "Destroyed" to support finding of guilt + imposing punishment of 300 Days Disc. Sep., in addition to punishment on March 31, 2010, as a partial fact-finder, because he's a defendant in lawsuit #09-C-170-bbc / #10-CV-109.
- 249) April 9, 2010, I filed appeal due process violation to Warden.
- 250) May 17, 2010, Deputy Warden Boughton affirmed C.R. disposition.
- 251) May 23, 2010, I filed ICRS challenging due process violations.
- 252) June 2, 2010, ICE + Boughton dismissed due process complaint.
- 253) June 6, 2010, I appealed ICE dismissal to CCE + OOS.
- 254) July 24, 2010, CCE + OOS dismissed due process complaint + affirmed disposition in WSPF-2010-10919.

26

Conduct Report 2154135

255) October 21, 2019, Defendant Kaiser and another's prior conduct report 2154135 charging Plaintiff Haines with DCL 304.271 for filing false lawsuit, letter, message sent to JCRS of 304.271 misconduct.

256) Defendant Haines 2154135, DCL 304.271 Haines denied Plaintiff Haines right to DCL 304.271 and Haines DCL 304.271/Place of Haines to file for 304.271 charge.

257) Plaintiff Defendant Haines and Haines by Defendant Haines imposed 304.271 days discipline for filing JCRS guidance of 304.271 misconduct.

258) May 13-20, 2019, Defendant Haines, Haines, approved retaliation.

Conduct Report 2154659

259) Dec. 21, 2019, Defendant Haines, Haines, Haines directed and approved Haines conduct report 2154659 for filing JCRS guidance of 304.271 misconduct.

260) Defendant Haines, Haines imposed 304.271 days discipline for filing 304.271.

Conduct Report 2154700

261) Jan. 31, 2021, Defendant Haines, Haines, E. Haines directed and approved Haines 2154700 Haines as retaliation for filing 304.271 misconduct. Defendant Haines stated LK 2154700 was for filing JCRS guidance, even though they have 304.271.

262) Feb 7/2013, in Emergency 30 days Demand.

Contract Report 22/1/2013

263) April 2, 2013, defendant Hines, Barker, & Hines approved & signed the contract for 22/1/2013
for the 30 days Demand.

264) April 2, 2013, defendant Hines, Barker, & Hines approved & signed the contract for 22/1/2013
for the 30 days Demand.

265) From 2013, defendant Hines, Barker, & Hines approved & signed the contract for 22/1/2013
for the 30 days Demand.

Contract Report 22/1/2013

266) Feb 7/2013, defendant Hines, Barker, & Hines approved & signed the contract for 22/1/2013
for the 30 days Demand.

267) Defendant Hines, Barker, & Hines approved & signed the contract for 22/1/2013
for the 30 days Demand.

268) Feb 7, 2013, Defendant Hines, Barker, & Hines approved & signed the contract for 22/1/2013
for the 30 days Demand.

Contract Report 22/1/2013

269) June 1/2013, defendant Hines, Barker, & Hines approved & signed the contract for 22/1/2013
for the 30 days Demand.

270) Plaintiff Hines, Barker, & Hines approved & signed the contract for 22/1/2013
for the 30 days Demand.

2/11) May 16, 2015, Defendant's Motion for summary judgment was granted and imposed 240 day discipline.

Conclusion Report 2/22/15

2/12) May 1-17, 2015, Defendant's Motion for summary judgment was granted and directed C. Broadhead, Plaintiff's wife, to R. 26.2550 for filing ICR's and/or affidavits.

2/13) Plaintiff's Motion for summary judgment was granted and directed Plaintiff to file affidavits.

2/14) May 17, 2015, Defendant's Motion for summary judgment was granted and imposed 180 day discipline for filing affidavits.

Conclusion Report 2/23/15

2/15) May 18-20, 2015, Defendant's Motion for summary judgment was granted and directed Plaintiff to file affidavits.

2/16) May 21-23, 2015, Defendant's Motion for summary judgment was granted and directed Plaintiff to file affidavits. Defendant's Motion for summary judgment was granted and imposed 240 day discipline for filing affidavits.

2/17) May 24, 2015, Defendant's Motion for summary judgment was granted and imposed 180 day discipline and 180 day suspension for filing affidavits.

2/18) May 25, 2015, Defendant's Motion for summary judgment was granted and directed Plaintiff to file affidavits. Defendant's Motion for summary judgment was granted and imposed 240 day discipline for filing affidavits.

Administrative Confinement

272) April 8, 2002, Incident: Pool Boiling Room, Vancouver.
Taylor, Paul, used excessive force on #1965307
#111564, #187744, #1965307, #1965344, #1965357.
to place them in the pool boiling room. Administrative
Confinement.

280) June 2, 2002, Incident: Pool Boiling Room, Vancouver.
Used excessive force on #1965307, #2155435,
#2154634, #2157333, #2211933, #1965307, #1965344,
to place them in the pool boiling room. Administrative
Confinement.

281) March 12, 2002, Incident: Pool Boiling Room, Vancouver.
Schuster, Eric used excessive force on #1965307,
C.B. 263672, #2356179, #2622922, #1965307, #111564,
#187744, #1965307, #1965344, #2155435,
to place them in the pool boiling room. Administrative
Confinement.

Administrative Confinement was a series of
transactions in use retaliatory conduct reports for
the grievances against prior reports by same
Defendants.

CLAIMS FOR RELIEF

282) Whether the intentional actions of Defendants Carr, Baemisch, Wal, Hamblin, Frank, Litscher, Boughton, Haines, Hubertse, Schneider, Brown, Ray, Gardner, Hanfield, Tom, M. Taylor, L. Primmer, Lt. Grandia, Sgt. Bausch, Lt. Boisen, C. H. Pence, Sgt. Sickinger, Hable, Sgt. Loxton, Sgt. Henneman, B. Kool, Scott Jones, Horner, T. Jones, Walters, Atty. Gen. acting under color of Federal and State law, violated Plaintiff Henderson's First Amend. right by circulating 42 U.S.C. § 1997, Dec 310, DL 12, DAI 11.6, DAI 312.60.01 "As Applied" Policy, custom, and practice to retaliate against Plaintiff Henderson by imposing twice (2) years of discipline for filing grievances/complaints in a business legal mail and Complaint System (ICRS) to intimidate and chill speech, was and continue to be done with deliberate indifference, constituting a violation of First (1st) Amend. U.S. Const. Free Speech and petition the government for redress.

283) Whether intentional acts of Defendants Carr, Baemisch, Wal, Hamblin, Frank, Litscher, Boughton, Haines, Hubertse, Schneider, Brown, Ray, Gardner, Hanfield, Tom, L. Primmer, Lt. Grandia, Lt. Boisen, Kool, Horner, Henneman, Hable, acting under color of State law, violated Plaintiff Henderson's rights

by ascribing criminal practices to him.
 "Notice of Time/Date/Place of Hearing" is required to discipline charges, even the denial of regular supervision privileges. Denial of staff privileges. Denial of temporary housing. Denial of telephone privileges. Denial of commissary or charges. Denial of written statements as defense, imposes hardship. 27 years solitary confinement as typical and significant hardship not in ordinary experience of prison life; was and continue to be done with deliberate indifference. Constitution violations: 1st Amendment, 14th Amend. U.S. Const. Due Process; and Equal Protection Clause for not provided Notice of Time/Date/Place of Hearing.

284) Whether actions of Defendant's Lischer Wolf, Fred Bremser, Homer, Norman, Roy, L. Brown, Flannery, Sarcher, Carl, Schaefer, acting with intent to speak and violate Plaintiff's rights to free speech and expression. Plaintiff's intent to speak, to open and read all prison papers and to protect rights of prisoners by mail, also including evidence with deliberate indifference to deny a prisoner's speech. Constitution violations: First Amendment, U.S. Const. Free Speech & Religion.

RELIEF REQUESTED

Plaintiff Thibodeau request the Court to GRANT following relief:

A.) Issue Writ of Habeas Corpus for the Plaintiff, 42 U.S.C. § 1983 and Biv. Act used by defendants Wall, Carr, U.S. Atty. Gen., Benjamin Hanes, Franklin, to impose discipline and administrative confinement for filing ICMS grievances, violate First Amendment, U.S. Const.

B.) Issue Compensatory Damages jointly against Defendants Wall, U.S. Atty. Gen., Hanes Benjamin Brown, et al. liable for abuse captured on body cam without, determined by a jury.

C.) Issue B Punitive Damages jointly against defendants Wall, Hanes, Carr, U.S. Atty. Gen., Hanes Benjamin Brown, et al. liable for abuse captured on body cam without, determined by a jury.

D.) Award Attorney Fees, Court expert witness fees, and litigation costs as determined by court.

E.) Appoint Plaintiff's counsel for the purpose of privilege/confidential prison rights terminations cannot have in their possession.

Date: May 18, 2021

Submitted for E-Filed:

Thane Henderson

Attorney

Case No. 1:21-cv-00346

Case No. 1:21-cv-00346

2021